REMARKS

I.   Introduction

In response to the Office Action dated March 24, 2004, claims 1, 7, 10, 11, 17, 20, 21, 27, and 30 have been amended. Claims 1-30 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II.   Prior Art Rejections

On page (2) of the Office Action, claims 1-8, 10-18, 20-28, and 30 were rejected under 35 U.S.C. §102(e) as being anticipated by Takashima et al., U.S. Patent No. 6,504,551 (Takashima). However, on page (4) of the Office Action, claims 9, 19, and 29 were indicated as being allowable if rewritten in independent form to include the base claim and any intervening claims.

Applicants acknowledge the indication of allowable claims, but respectfully traverse these rejections.

Specifically, independent claim 1 was rejected as follows:

> As to claim 1, Takashima discloses Apparatus for processing image data comprising:
> storage means for storing instructions (fig. 1 12);
> memory means for storing the instructions during execution and for storing image data (fig. 1 13);
> processing means and display means for allow user to interact and modify the color values, wherein,
> identifying a color vector (Pi) and luminance range (BL and WL) for said color vector (fig. 3a, col. 16 lines 31-52):
> defining a color vector function (equation 1) in response to said identification, in which the color vector (Pi) is a function of luminance (col. 15 line 42-col. 16 line 16);
> processing source image data to identifying luminance values (fig. 3A-B, col. 16 line 31-col. 17 line 32); and
> modifying colors in response to the luminance values with reference to the color vector function (fig. 2-fig. 3B, col. 14 line 15-col 16 line 16).

Applicants traverse the above rejections. Specifically, Takashima does not teach, disclose or suggest a user identifying a luminance range independently from identifying a color vector.

Independent claims 1, 10, 11, 20, 21, and 30 are generally directed to easily warping the color of image data. Specifically, the claims each provide for input received from a user. The input is used to identify a colour vector and a luminance range for the colour vector. The amended claims provide that the identification of the luminance range is performed independently of the identification of the colour vector. In this regard, two separate identifications are performed

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through user input. A color vector function is then defined (in response to the identifying) followed by the modification of colours in response to the luminance values with reference to the colour vector.

The cited reference does not teach or suggest these various elements of Applicants' independent claims.

Takashima merely describes the color of plural pixels making up a source video image corrected by a computer 10, a hard disc device 20 and a picture processing device 30. The computer 10 functions as a parameter setting unit for setting plural parameters for designating the source color and the destination color and a computing unit for computing correction data for color correction from the source color to the destination color using the plural parameters set by the parameter setting unit. The hard disc device 20 stores the source video image and effects color correction in the picture processing device 30 for correcting the color of a pixel corresponding to the source color contained in the source video image to the destination color. (See Abstract).

However, Takashima lacks any discussion about independently identifying a luminance value and a colour vector. Instead, Takashima teaches away from Applicants' invention because it describes the modification of a characteristic curve of a color signal which includes the modification of the black level and white level (see col. 16, lines 31-52).

In rejecting the claimed element of identifying the colour vector and luminance range, the Office Action relied on FIG. 3A and the text in column 16, lines 31-52. FIG. 3A provides:

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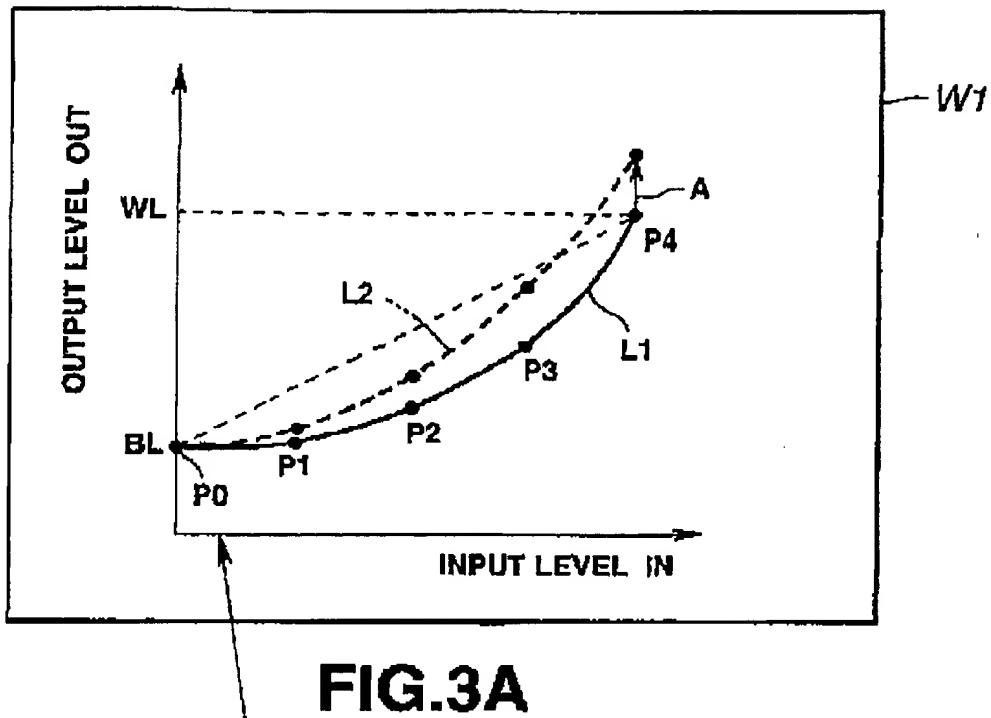
FIG.3A

The cited text describes FIG. 3A and provides that the beginning point P0 and the terminal point P4 denote the black level BL and white level WL, with the curvature of the curve denoting gamma. Accordingly, the luminance black and white levels are identified on the curve itself as the end points. The text describes how the operator can modify the curve by grabbing individual points including the beginning point P0 and terminal point P4. In this regard, Applicants note that instead of identifying the luminance range independently from the colour vector, Takashima identifies the white level and black level simultaneous with and as part of the identification of the characteristic colour curve. Accordingly, unlike the present claims (which are supported by the original specification and FIGS. 6, 7, and 8) which provide for an independent identification of the luminance range (e.g., by moving range markers 616 and 617) and the colour vectors 612-614, Takashima provides for a single motion that affects both the characteristic color curve and the luminance values. Not only does such a description fail to teach, describe, or suggest, implicitly or explicitly, the present invention, but it teaches away from practicing the present invention as claimed.

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Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Takashima. In addition, Applicants' invention solves problems not recognized by Takashima.

Thus, Applicants submit that independent claims 1, 10, 11, 20, 21, and 30 are allowable over Takashima. Further, dependent claims 2-9, 12-19, and 22-29 are submitted to be allowable over Takashima in the same manner, because they are dependent on independent claims 1, 10, 11, 20, 21, and 30, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-9, 12-19, and 22-29 recite additional novel elements not shown by Takashima.

III.   Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

GATES & COOPER LLP
Attorneys for Applicant(s)

Howard Hughes Center
6701 Center Drive West, Suite 1050
Los Angeles, California 90045
(310) 641-8797

Date: June 23, 2004
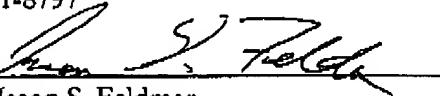
By:_____
Name: Jason S. Feldmar
        Reg. No.: 39,187

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